

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMDOCS (ISRAEL) LIMITED, an Israeli
Corporation,

Plaintiff,

v.

OPENET TELECOM, INC., a Delaware Corporation,
and OPENET TELECOM LTD., an Irish Corporation,

Defendants.

Case No. 1:10-cv-910 (LMB/TRJ)

JURY TRIAL DEMANDED

DEFENDANTS' PROPOSED VOIR DIRE

Pursuant to Local Civil Rule 51, Defendants Openet Telecom, Inc. and Openet Telecom Ltd. (collectively "Openet") submit the following proposed voir dire questions. Specifically, Openet incorporates Amdocs' Proposed Jury Voir Dire Questions (Dkt. No. 234), reproduced below, with the identified objections to Questions 7 and 11, and identify additional proposed questions for voir dire.

AMDOCS' PROPOSED VOIR DIRE QUESTIONS

1. Have any of you had any training in computer science or software?
2. Have any of you had any training in the legal field?
3. In your job, do any of you supervise other people?
4. Have any of you ever served in the military?
5. Has anyone owned their own business?
6. Has anyone worked in research and development?

7. Have you ever worked for a company that had patents or other intellectual property rights that it tried to enforce?

Objection: Openet objects to this question absent the following accompanying question: “Have you ever worked for a company that has been sued for alleged infringement of patent or other intellectual property rights?”

8. Have you or anyone in your family ever applied for, been granted, or own any patents?
9. Have you ever worked in a job where you dealt with contracts or negotiated deals? If yes, please explain.
10. Have you invented or developed any technology yourself, whether as part of your employment or on your own? If yes, please explain.
11. Does anyone agree that it is common for companies to copy each other’s products and then make slight changes?

Objection: Openet objects to this question as inflammatory and irrelevant as there has been no accusation of copying in this case.

12. Have you or anyone you know ever been employed by a cell phone, cable, or Internet service provider (e.g., Verizon, Sprint, AT&T, Time Warner Cable, or Cricket)? If yes, which company?
13. Does anyone have a bias either in favor of or against people from Israel or Ireland?
14. Are you familiar with the parties in this case, Amdocs or Openet?
- (a) Have you (or anyone you know) ever been employed by any of these companies?
- (b) Have you ever transacted business with any of these companies?

- (c) Do you own stock in these companies?
 - (d) Have you ever used any of the products sold by these companies?
15. This case involves Amdocs (Israel) Limited's claims of patent infringement against Openet Telecom, Inc. and Openet Telecom Ltd. Have you heard anything about this case from any source, including from another person, a press release, or the news media? If yes, please describe the source and the information that you heard.
16. The following individuals may be called to testify as witnesses at the trial in this case: Tal Givoly, Zur Yahalom, Ellen Zegura, Mark Hosfield, Limor Schweitzer, Eran Wagner, Udi Hershkovich, Joseph Hogan, Philip Hogan, Niall Norton, Eimer McGovern, Niall Byrne, Alan McNamee, Michael Manzo, Juliana Su, Gaogao Wang, Kevin J. Zilka, Patrick McDaniel, Michael I. Shamos, or Mary Woodford. Do you know any of these individuals?
17. Do you know any of the following law firms and/or attorneys involved in this case:
- (a) Gregory Lantier, James Quarles, Nels Lippert, Calvin Walden, Victor Souto, Michelle Kanter, Joshua Salzman, David Smith, or Kevin Heffel of Wilmer, Cutler, Pickering, Hale and Dorr, LLP or;
 - (b) Brian Pandya, Joseph Shin, James Wallace, Anthony Son, Eric Weisblatt, or Adrienne Johnson of Wiley Rein LLP?
18. Have you ever given testimony in a lawsuit? If so, please describe the lawsuit and the nature of your participation. Was there anything about the experience that would make it difficult for you to be fair and impartial in this case?

19. Have you (or has any member of your family) ever sued anyone or been sued by someone else? If yes, please describe what the case was about, whether you or your family member was the plaintiff or defendant, and how was it resolved.

OPENET'S PROPOSED VOIR DIRE QUESTIONS

20. Do you know any other members of this jury panel?
21. Do you know Judge Brinkema or any of the Court's staff, including the clerk, marshall, reporter, law clerks or assistants?
22. Do you hold an opinion regarding whether the U.S. legal system provides justice?
23. Do you believe that disagreements between corporations should be resolved outside of a courtroom? If yes, explain.
24. Have you or anyone in your immediate family been involved in a dispute over a Intellectual Property rights? What type of Intellectual Property rights? What was the nature of the dispute?
25. Do you view intellectual property rights such as patents favorably or unfavorably? Why?
26. Have you or any member of your immediate family used a cellular telephone in the past 6 years? If yes, is that cellular telephone a "smartphone" (e.g. iPhone, Android, or BlackBerry)?
27. Have you or any member of your immediate family use wireless telephone and/or data service from AT&T, Verizon, Sprint and/or T-Mobile? If yes, are you the one that receives the bills for those services?
28. Have you or any member of your immediate family ever been called to serve on a jury? If yes, did you or your family member end up serving as a juror? If not,

why were you or your family member excused? If you or a family member did serve on a jury, what was the nature of the case(s)? What was the verdict?

29. Do you have any special physical disability or problem that would make it difficult or impossible for you to serve as a juror?
30. Do you have any trouble reading, writing, speaking, or understanding the English language?
31. Would you be unduly burdened with financial, business, or family problems by serving as a juror in this trial?
32. Is there any reason that you would like to serve as a juror? If so, what is the reason?
33. Do you harbor any prejudice or bias which would prevent you from sitting as a fair and impartial juror in this case?
34. Based on the questions that were asked of you today, is there any reason that would prevent you from being a fair juror in this case?
35. Do you know of any other matter which you believe should be called to the Court's attention as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law? This is the time for you to give us any additional information we may have failed to ask about, which you think may bear on your ability to serve as a juror and to fairly and impartially weight the evidence. If anyone is uncomfortable discussing something in front of the panel, we would be happy to have you speak with the Court and the parties privately. Please raise your hand if there are any matters you wish to bring to our attention.

Dated: July 18, 2011

Respectfully submitted,

/s/ Joseph Shin

James H. Wallace, Jr. (admitted *pro hac vice*)

Anthony H. Son (admitted *pro hac vice*)

Brian H. Pandya (VSB No. 72233)

Joseph Shin (VSB No. 79051)

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*Counsel for Defendants Openet Telecom, Inc.
and Openet Telecom Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July, 2011, I caused the foregoing document to be served on the following counsel for Amdocs (Israel) Limited:

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/s/ Joseph Shin